

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF NEW YORK**

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WANJUAN MEDIA (TIANJIN) CO., LTD. a.k.a. PILOT  
FILM AND TELEVISION MEDIA (TIANJIN) CO.,  
LTD.,

Plaintiff,

v.

AMAZON.COM, INC., AMAZON.COM SERVICES  
LLC, and “JOHN DOES” 1-5,

Defendants.

**[PROPOSED] REVISED  
CASE MANAGEMENT  
PLAN**

Civil Action No.:

1:22-cv-01434-JPO

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It is hereby ORDERED as follows:

1. Automatic disclosures required by Rule 26(a)(1) of the Federal Rules of Civil Procedure have been made.
2. The parties have exchanged their discovery requests and have served written responses and objections to written discovery requests.
3. The deadline for fact witness depositions: March 9, 2023.
4. All fact discovery is to be completed by: April 10, 2023.
5. All expert discovery, including expert depositions, shall be completed no later than May 25, 2023.
6. All motions and applications shall be governed by the Court’s Individual Practices.
7. All counsel must meet in person to discuss settlement within fourteen (14) days following the close of fact discovery.
8. Unless otherwise ordered by the Court, any summary judgment motion shall be filed within fourteen (14) days of the close of all discovery. The parties shall submit a Joint Pretrial Order prepared in accordance with Fed. R. Civ. P. 26(a)(3) and the Court’s Individual Practices within thirty (30) days of a decision on such motion. If no motion for summary judgment is filed, the parties shall file the Joint Pretrial Order within thirty (30) days of the close of discovery. Any motions in limine shall be filed on or before the date on which the Joint Pretrial Order is due. If this action is to be tried before a jury,

proposed voir dire, jury instructions, and verdict form shall also be filed on or before the Joint Pretrial Order due date. Counsel are required to meet and confer on a joint submission of proposed jury instructions and verdict form, noting any points of disagreement in the joint submission. Jury instructions may not be submitted after the Joint Pretrial Order due date, unless they meet the standard of Fed. R. Civ. P. 51(a)(2)(A). If this action is to be tried to the Court, proposed findings of fact and conclusions of law should be submitted on or before the Joint Pretrial Order due date.

9. Do the parties consent to trial before a magistrate judge pursuant to 28 U.S.C. §636(c)?  
**(Answer no if any party declines to consent without indicating which party has declined.)**      No      √
10. The parties shall file a joint status letter on or before \_\_\_\_\_.

SO ORDERED

**Dated: New York, New York**

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**J. PAUL OETKEN  
UNITED STATES DISTRICT JUDGE**